

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Amendment of the Rules relating to
Permissible Uses of the Vertical
Blanking Interval of Broadcast
Television Signals

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} MM Docket No. 92-305

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF EEG ENTERPRISES, INC.

EEG Enterprises, Inc. ("EEG") hereby responds to the Commission's proposal to amend rules governing use of the vertical blanking interval ("VBI") of television broadcast signals. Specifically, the commission has proposed to allow use of line 21, field 2, of the VBI for transmission of closed-captioning and other data services and to reserve line 19 of the VBI for optional use of a ghost-cancelling reference signal. EEG supports both of these proposals, particularly that dealing with use of line 21.

I. **BACKGROUND**

EEG has been involved in the Line 21 Closed Captioning system since 1979. We have been continuously participating in the system development and equipment manufacture for the Line 21 system since then. Almost all transmissions of Line 21 Closed Captioning information since the start of broadcasting in 1980 has been done through EEG encoders.

In 1989, EEG was developing a single chip solution for the Line 21 Decoder module with support from the US Department Of Education through its SBIR program. It was this development, along with similar information from NCI, that gave impetus and credibility to the practicality of incorporating such an ASIC into the TV receiver

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itself. These developments gave rise to the Television Decoder Circuitry Act of 1990 ("Decoder Act"). The EEG integrated circuit, which conforms to the specifications detailed in the Decoder Act, is now being manufactured and sold for use in television receivers and VCRs by Motorola and Zilog.

EEG is a member of the Consumer Electronics Group of the Electronics Industries Association ("EIA/CEG") and of the EIA/CEG Task Force, which has now been reconstituted as the Television Data Systems Subcommittee ("TDSS"). EEG has actively participated in the deliberations of the TDSS in its efforts to improve and expand the knowledge and usefulness of closed-captioning.

II DISCUSSION

It was anticipated that the Decoder Act would stimulate the use of line 21 closed-captioning. As the starting date for the availability of TV sets conforming to the Decoder Act nears, increased interest is being shown by many in the use of closed-captioning, particularly in expanding to multilingual captions. Such added capability strains the use of line 21 field 1. The additional data channels that would result from this proceeding responds directly to this need for more capacity.

Some of the caption decoder circuits being built into the new TV receivers and VCRs already have the ability to respond to line 21 signals in field 2 if the caption code table used in field 2 is the same that has been specified for field 1 transmissions. Other implementations probably have anticipated favorable action on these proceedings and have provided the capability for the field 2 features contained within the working draft of the Recommended Practice for Line 21 Data Services for NTSC ("RP 608") being developed by the TDSS. RP 608 recommends some code changes from the current line 21 code tables. EEG believes that the majority of TV receivers that become available within the first year of the Decoder Act's implementation will not be

able to process line 21, field 2 data if the RP608 code is used. Never-the-less, the fact that most decoder implementations have made provisions for expansion to field 2 processing, in one form or another, points to the rapid availability of TV receivers with expanded captioning capability within a year of the empowering of the use of field 2, with no significant effect on the cost to the consumer.

EEG believes that the provision for other text and extended data services to be transmitted on line 21, field 2, on an as available basis, also adds significant value potential to the extended capacity. Text services already exist that could immediately take advantage of the additional capacity. Extended data services should have the opportunity to develop rapidly once cost effective implementations become available.

EEG strongly supports the Commission's proposals and urge that the rules changes be adopted expeditiously.

Respectfully submitted,

EEG ENTERPRISES, INC.

By 
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